## **REMARKS/ARGUMENTS**

Applicant responds herein to the Office Action dated February 24, 2005.

Claim 1 is being rejected on grounds of anticipation by Schneider (4,981,031). Further, claims 1-4 are being rejected on grounds of anticipation by VanderZee (5,979,212), and finally claims 5-7 are being rejected on the grounds of anticipation by Allgoewer (5,727,416). Reconsideration is requested in view of the following remarks.

The invention, as recited in claim 1, is provided with: a first carrier mechanism which feeds a carrier located on a most upstream side in the direction of a pressline; and a second carrier mechanism which feeds a plurality of carriers located downstream in the direction of the press line.

With respect to such a structure, the Examiner points out a conveying rod system 37 which drives carriages 23, 25, 27, 29 and 31 and a conveying rod system 36 which drives the carriages 24, 26, 28 and 30 of the cited Schneider reference. However, all the carriages connected to each of the conveying rod systems 36 and 37 are connected to one another and are moved integrally (column 3, lines 37-42). Therefore, the conveying rod systems of Schneider are clearly different from the first and second carrier mechanisms according to the invention as recited in claim 1.

Moreover, in Schneider, two types of carriages which are respectively driven by different conveying rod systems are provided for each of the presses, and a single carrier motion shown by reference numerals 82-85 of FIG. 4 is realized by a combination of two types of carriages (column 4, lines 13-32). That is, unlike the invention as recited in claim 1, Schneider fails to disclose or suggest the structure in which a carrier mechanism is provided for the carriage located on the most upstream side (i.e., the carriages 31 or 30 in Schneider) and a carrier mechanism for the other carriages (i.e., a group of the carriages 28, 26 and 24). Therefore, it is impossible for the other carriages of Schneider to realize a carrier motion that is different from a carrier motion of the most upstream carriage.

Further, in accordance with the invention as recited in claim 1, the cross bars are capable of being raised and lowered.

With respect to such a structure, the Examiner points out a traverse 34 provided for the conveying rod systems 36 and 37.

However, the carriages of Schneider move in the horizontal direction as shown by reference numerals 82-85 of FIG. 4. That is, the carriages of Schneider are incapable of being raised and lowered. Moreover, since the traverse 34 connects opposing carriages, the traverse 34 moves in the same manner as the carriages. Therefore, the traverse 34 is also incapable of being raised and lowered.

The Examiner further asserts that the carriers of the invention as recited in claim 1 correspond to the carriages shown in FIG. 14 of the VanderZee reference. However, as described above, the invention as recited in claim 1 is provided with the first and second carrier mechanisms.

In contrast, FIG. 14 of VanderZee merely discloses two cross bar assemblies, i.e., one upstream side cross bar assembly and one downstream side cross bar assembly. Therefore, VanderZee fails to disclose or suggest a plurality of carriers located downstream, let alone the first and second carrier mechanisms.

According to the invention as recited in claim 2, each of the carriers is provided with a vertically moving body capable of being raised and lowered independently, thereby allowing the amount of raising and lowering of the cross bars to be set individually.

In contrast, as described above, all the carriages connected to each of the conveying rod systems of Schneider are connected to one another, so that it is impossible in Schneider to operate the carriages and the traverse 34 independently.

As recited in claims 2 and 3, the cross bars are fitted between vertically moving bodies of mutually opposed carriers on the left and right guide beams. In other words, two carriers form a pair of carriers and are mutually opposed on the left and right guide beams.

In contrast, FIG. 14 of VanderZee merely discloses one pair of upstream side carriages and one pair of downstream side carriages. It is clear that VanderZee fails to disclose or suggest a plurality of pairs of carriers located downstream which are fed in the press line direction by the second carrier mechanism.

As recited in claim 3, a plurality of driving devices which raise and lower vertically moving bodies of a plurality of groups of adjacent carriers are connected via a power

00698553.1 -7-

transmission mechanism, and the vertically moving bodies are raised or lowered simultaneously by one of the drive devices corresponding to the respective groups. With such a structure, in the case in which carrier motions in adjacent press stations are the same, it is possible to realize operation using a single group of drive devices. As a result, the number of actuators can be reduced, and it is possible to realize life action using a single group of drive devices irrespective of a fault in a drive device.

In contrast, the respective pairs of carriages in VanderZee (e.g., reference numerals 126 and 128b shown in FIG. 4) are independent from each other, and they are driven independently by motors 230 corresponding to the individual carriages. Therefore, VanderZee fails to disclose or suggest the structure as recited in claim 3, and the advantageous effect resulting from such a structure cannot be obtained from VanderZee.

With respect to claim 5, the Examiner asserts that the claimed feed beams correspond to the transfer rail 3 of Allgoewer. However, according to the invention as recited in claim 5, the feed beams are movable in the direction of the press line.

In contrast, Allgoewer merely shows that traveling carriages 2, 15, 18 and 19 are movable on the transfer rail 3, and fails to disclose or suggest that the transfer rail 3 itself is movable in the direction of a press line.

The invention as recited in each of claims 7 and 10 is provided with a connecting rod which connects lifting devices, which are installed at positions above the feed beams, with vertically moving bodies in a freely swinging manner. With such a structure, the cross bar can be displaced in the direction of the press line, and thus the cross bar can perform feed and lifting operations.

With respect to such a structure, the Examiner points out that a lifting and lowering device 1 and a motor 6 of Allgoewer are mounted in a freely swinging arrangement through a socket joints 25 and 26. However, as shown in FIG. 6, Allgoewer merely discloses that the opposing lifting and lowering devices 1 are connected by a cross traverse 12, and thus it fails to disclose or suggest the connecting rod that connects the lifting devices with the vertically moving bodies as recited in claims 7 and 10. The cross bar 12 of Allgoewer can move only in the vertical direction, and it is impossible for the cross traverse 12 to perform both the feed and lifting operations.

00698553.1 -8-

As recited in claim 8, the respective lifting devices are driven independently. In contrast, in Allgoewer, the traveling carriages 2, 15 move simultaneously and uniformly, and drives 6 are electrically coupled so that lifting movement of the traveling carriages take place synchronously (column 3, lines 32-36). Thus, Allgoewer fails to disclose or suggest the structure of the invention as recited in claim 8.

In addition, although Allgoewer includes motors 6 for the respective traveling carriages and the traveling carriages 2 and 15 are raised or lowered separately as shown in FIG. 6, it merely shows that a metal sheet part 16 is rotated as shown in FIG. 6. Allgoewer neither discloses nor suggests that a pair of the traveling carriages 2 and 15 and a pair of the traveling carriages 18 and 19 (see FIG. 3) are capable of being moved independently.

The foregoing remarks are also applicable to newly presented claim 9, which depends from claim 8. Therefore, all of the claims in the application are submitted to distinguish over the prior art of record.

It is noted that newly presented claim 8 is based on and supported by the description in the instant specification at page 13, lines 14-17 and that newly presented claims 9 and 10 are modeled after claims 6 and 7, respectively.

In view of the foregoing, the Examiner is respectfully requested to reconsider the application, allow the claims and pass this case to issue.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on May 19, 2005:

MAX MOSKOWATZ

Name of applicant, assignee or Registered Representative

Signature
May 19, 2005

Date of Signature

Respectfully submitted,

MAX MOSKOWITZ
Registration No.: 30,576

OSTROLENK, FABER, GERB & SOFFEN, LLP

1180 Avenue of the Americas

New York, New York 10036-8403

Telephone: (212) 382-0700